

FILED
FROM OVERNIGHT BOX

DEC 26 2000

KEVIN E. O'BRIEN
UNITED STATES
BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

1 **Randy Nussbaum, #006417**
2 **Michael E. Gottfried, #010623**
3 **JABURG & WILK, P.C.**
4 **3200 North Central Avenue, Suite 2000**
5 **Phoenix, Arizona 85012**
6 **(602) 248-1000**

7 **Attorneys for Patrick O'Connor**

8 **IN THE UNITED STATES BANKRUPTCY COURT**
9 **DISTRICT OF ARIZONA**

10
11 In re:

12 **CHARLES THOMAS BROWN d/b/a TOM**
13 **BROWN PREFERRED TRUST**
14 **COMPANY,**

15 Debtor.

16 **MAUREEN GAUGHAN, Chapter 7 Trustee**

17 Plaintiff,

18 v.

19 **ANN AKAMINE, et al.,**

20 Defendants.

In Proceedings Under Chapter 7

No: B97-14228 PHX GBN

Adv. 99-746

**MOTION TO EXTEND TIME TO
APPEAL**

21 Patrick O'Connor, through undersigned counsel, hereby moves pursuant to Bankruptcy Rule
22 8002(c) to extend the time to file a notice of appeal in the above-captioned matter for a period of
23 twenty (20) days until and through January 16, 2001. Judgment against Mr. O'Connor was entered
24 on the docket in this court on December 15, 2000 in two matters: Final judgment was entered
25 against Patrick O'Connor pursuant to the Trustee's Motion for Partial Summary Judgment and a
26 final Order was entered granting the Trustee's Motion for Partial Summary Judgment.


27 As the Court might be aware, the undersigned firm was recently retained by Mr. O'Connor
28 and this additional time is necessary to evaluate the underlying facts in this particular matter and
the merits of going forward with an appeal. Accordingly, it is respectfully requested that the court

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1 grant this Motion to Extend the Time to Appeal until and through January 16, 2001.

2 DATED this 26th day of December, 2000.

3 JABURG & WILK, P.C.

4 

5 Randy Nussbaum
6 Michael E. Gottfried
7 Attorneys for Patrick O'Connor

8 COPY of the foregoing mailed on
9 this 26th day of December, 2000 to:

10 John J. Fries
11 Sam S. Tiffany
12 Ryley, Carlock & Applewhite
13 Suite 2700
14 101 North First Avenue
15 Phoenix, Arizona 85003-1973
16 Attorneys for Chapter 7 Trustee, Maureen Gaughan

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